

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Dashawn A. LaRode

Plaintiff(s),

AFFIRMATION OF SERVICE

-against-

GEORGE BADEEN dba
ALLIED FINANCE ADJUSTERS/
NYCR INDUSTRIES
CORP.

Defendant(s).

24 -CV- 8622 (HG) ()

I Sage El

_____, declare under penalty of perjury that I have
served a copy of the attached Motion For Default Judgment Affirmation
in support of motion for Default Judgment

upon George Badeen

by mailing it to USPS Certified # 9589071052701132091383

whose address is: 70 Plain Avenue, New Rochelle, NY, 10801,
NYCR Industries Corp.

Dated: 01-13, 2025
Central Islip, New York

By: Sage El
Signature

c/o 388 East 49 street
Address

Brooklyn, New York republic
City, State & Zip Code [11203]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

(2)

Dashawn A. LaRode

Plaintiff(s),

-against-

GEORGE BADEEN, dba ALLIED
FINANCE ADJUSTERS/NYCR INDUSTRIES

Defendant(s).

MOTION FOR
DEFAULT JUDGMENT

~~24-CV-8662(HG)~~
24-CV-8622-HG

Plaintiff Dashawn LaRode hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in favor of plaintiff and against defendant(s) George Badeen on the grounds that said defendant(s) failed to answer or otherwise defend against the complaint.

Dated:

By. Dashawn L

(Signature)

By. Dashawn A. LaRode

Print Name of Plaintiff Pro Se

151 Grafton Street

Address

Brooklyn, New York republic [11212]

TO: (Put Name and Address of
Each Defendant(s) or Defense Attorney)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
Dashawn A. LaRode

AFFIRMATION IN SUPPORT
OF MOTION FOR DEFAULT
JUDGMENT

Plaintiff(s) 24 CV - 8622 (HG)
-against-
GEORGE BADEEN, dba ALLIED
FINANCE ADJUSTERS/NYCR INDUSTRIES CORP.
Defendant(s).

-----X
I, Dashawn LaRode hereby declares as follows:

1. I am the plaintiff in this action.
2. This action was commenced pursuant to 18 USC 894, 12 USC 83, 28 USC § 1331
3. The time for defendant(s), 01-08-2025, to answer or otherwise
FCRA, FDCPA
move with respect to the complaint herein has expired.
4. Defendant(s), George Badeen, has not answered or otherwise
moved with respect to the complaint, and the time for defendant(s) George Badeen
to answer or otherwise move has not been extended.
5. That defendant(s) George Badeen default has been noted by the
Clerk of Court. A copy of the Certificate is attached hereto.

6. Defendant(s) George Badeen is indebted to plaintiff,
I, Dashawn LaRode in the following manner (state the facts in support of the claim(s)):
On December 5, 2024, George Badeen in conjunction with NYCR
Industries Corp; wrongfully repossessed my MDX Acura
2024. This constitute Actual damage in the amount of \$10,000.00
pursuant to (15 USC §§ 1681n(a)(1), 1681o(a)(1), and 1692k(a)(1):

Statutory damages in the amount of \$ 5,000,000.00 pursuant to (15 USC § 1681 n(a)(1) and (1692k(a)(2)(A).

Punitive damages in the amount of \$ 30,000,000.00 pursuant to (15 USC § 1681 n(a)(2). And reasonable attorney's fees and cost in the amount of \$ 65,000.00 pursuant to (15 USC 1681 n (a) (3), 1681 o (a)(2) and (1692k(a)(3).

WHEREFORE, plaintiff Dashawn LaRode requests that a default judgment be entered in favor of plaintiff Dashawn LaRode and against defendant(s) George Badleen

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, that no part thereof has been paid, and that the disbursements sought to be taxed have been made in this action or will necessarily be made or included in this action.

Dated: 01-13-2025

By: Dashawn LaRode
(Signature)

By: Dashawn LaRode
(Print name)

c/o: 151 Grafton Street
(Address)

Brooklyn, New York republic

[11212]